

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MEDTECH PRODUCTS, INC.,

Plaintiff,

No. 07-CV-3302 (KMK)(LMS)

-v-

ECF Case

DENTEK ORAL CARE, INC., et al.,

Defendants.

DECLARATION OF
MICHAEL A. FREEMAN, ESQ.

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MICHAEL A. FREEMAN, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am a partner in Greenberg Freeman LLP, counsel to defendants Ray Duane and C.D.S. Associates, Inc. (collectively, the “Duane Defendants”) in this action. I submit this declaration to place before the Court the exhibits cited in the Duane Defendants’ motion to dismiss the Second Amended Complaint (“SAC”) pursuant to Fed. R. Civ. P. 12(b)(6) and for other relief.

2. All the documents attached hereto are also attached as exhibits to the SAC.

3. Attached as Exhibit A is a copy of a document entitled Consulting Agreement between the Duane Defendants and Dental Concepts, LLC, dated as of September 30, 1999, which includes as an attachment the Proprietary Information and Inventions Agreement. These two documents are attached to the SAC as exhibits A and C, respectively.

4. Attached as Exhibit B is a copy of a document entitled General Release between Ray Duane and Dental Concepts LLC, signed by both parties in November 2005. This document is attached to the SAC as Exhibit G.

Dated: New York, New York
February 29, 2008

/s/ *Michael A. Freeman*

MICHAEL A. FREEMAN